

Case 1:20-cr-00698-AT Document 40 Filed

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June 16, 2021

BY ECF

The Honorable Analisa Torres United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States v. Jose Gonzalez, a/k/a "Junior,"</u> 20 Cr. 698 (AT)

Dear Judge Torres:

A status conference is scheduled in the above-captioned matter for June 21, 2021. The Government writes respectfully to request an approximately 30-day adjournment of the conference. The Government and defense counsel have been engaged in productive discussions regarding possible pretrial resolution, and have reached an agreement in principle for the defendant to enter a plea of guilty pursuant to a plea agreement. The adjournment is requested to permit parties formalize the proposed agreement and for defense counsel to review and advise the defendant, who is detained, regarding the proposed agreement.

In the event that the Court grants the requested adjournment, the Government respectfully requests that the Court exclude time under the Speedy Trial Act, from June 21, 2021 until such date as the conference is rescheduled for the reasons stated above. The Government submits that the ends of justice served by the continuance outweigh the best interests of the public and the defendants in a speedy trial. See 18 U.S.C. § 3161(h)(7)(A).

I have communicated with defense counsel, Mark DeMarco, who consents to the adjournment and exclusion of time.

Respectfully submitted,

AUDREY STRAUSS United States Attorney

Brott M. Kalikov

Assistant United States Attorney

(212) 637-2220

Cc: All counsel of record (via ECF)

GRANTED. The status conference scheduled for June 21, 2021, is ADJOURNED to **July 26, 2021**, at **11:00 a.m**.

Time until July 26, 2021, is excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), because the ends of justice served by excluding such time outweigh the interests of the public and Defendant in a speedy trial in that this will allow for the Defendant to continue discussions regarding pretrial dispositions.

SO ORDERED.

Dated: June 17, 2021

New York, New York

ANALISA TORRES United States District Judge